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SEALED

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

2012 NOV 28 PM 1:08

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY
DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

**JENELIUS O. CREW, (1),
MICHELLE RENEE WILLIAMS, (2),
KAYLA REANNE McNEEL, (3),
TEYAWNA LORINE ROBERSON, (4),
ARNOLDO LOUIS LOPEZ, (5), aka "Looney,"
LIBERTAD SANTOS LOPEZ, (6)
and
MICHAEL ALLEN CERVANTES, (7),**

Defendants.

CRIMINAL NO. SA-12-CR-860(XR)

**SUPERSEDING
INDICTMENT**

**[Violations: 18 U.S.C. § 371 and
924(a)(1)(A) (Count 1)
Conspiracy to make false statements
on records of a licensed federal
firearms dealer & aiding and abetting;

18 U.S.C. § 2 and 924(a)(1)(A)
(Counts 2-17) False statement on
records of a licensed federal firearms
dealer and aiding and abetting**

THE GRAND JURY CHARGES THAT:

At all times relevant to the Indictment, the Defendants,

**JENELIUS O. CREW, (1),
MICHELLE RENEE WILLIAMS, (2),
KAYLA REANNE McNEEL, (3)
TEYAWNA LORINE ROBERSON, (4),
ARNOLDO LOUIS LOPEZ, (5), aka "Looney,"
LIBERTAD SANTOS LOPEZ, (6), and
MICHAEL ALLEN CERVANTES, (7),**

and other persons both known and unknown to the Grand Jury, unlawfully and with intent to commit offenses against the United States, devised a scheme and artifice to make false statements during the acquisition of firearms.

Introduction

1. When an individual purchases a firearm from a Federal Firearms Licensed Dealer, the purchaser is required by federal law to complete ATF Form 4473, Firearms Transaction Record, which requires the purchaser to answer the following question:

“Are you the actual transferee/buyer of the firearm(s) listed on this form?”

2. Federal Firearms Licensed Dealers are prohibited from transferring a firearm to someone who is buying on behalf of another individual. Such a transaction is commonly known as a “straw purchase.”

3. Individuals seeking to purchase firearms from Federal Firearms Licensed Dealers are also cautioned in Question Number 11.a:

“Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you.”

4. Individuals seeking to purchase firearms from Federal Firearms Licensed Dealers are informed and acknowledge the following:

“I understand that answering “yes” to question 11.a. if I am not the actual buyer is a crime punishable as a felony under Federal law, and may also violate State and/or local law.”

5. At all times relevant to this indictment Arnoldo Louis Lopez and Jenelius O. Crew sought to acquire semi-automatic rifles, in the name of persons other than themselves. Both Arnoldo Louis Lopez and Jenelius O. Crew sought to hide the fact that they were the actual purchasers because both Arnoldo Louis Lopez and Jenelius O. Crew were convicted felons and cannot purchase firearms themselves.

6. At all times relevant to this indictment, Arnoldo Louis Lopez and Jenelius O. Crew used Michelle Renee Williams, Kayla Reanne McNeel, Teyawna Lorine Roberson, Libertad

Santos Lopez and Michael Allen Cervantes and two individuals identified only as C.R.R. and P.N.S. to "straw purchase" firearms.

COUNT ONE
[18 U.S.C. Sections 371 and 924(a)(1)(A)]

7. The Introduction of this Indictment is re-alleged in its entirety and incorporated herein by reference.

8. Between July 16, 2012 and September 2, 2012, in the Western District of Texas, the Defendants,

**JENELIUS O. CREW, (1),
MICHELLE RENEE WILLIAMS, (2),
KAYLA REANNE McNEEL, (3),
TEYAWNA LORINE ROBERSON, (4),
ARNOLDO LOUIS LOPEZ, (5), aka "Looney,"
LIBERTAD SANTOS LOPEZ, (6),
and
MICHAEL ALLEN CERVANTES, (7),**

and others unknown to the Grand Jury did knowingly and willfully conspire and agree together and with each other to violate the laws of the United States, to wit, Title 18, United States Code, Sections 371 and 924(a)(1)(A), making false statements during the purchase of firearms.

The Object of the Conspiracy

9. The object of the conspiracy was acquisition of firearms by persons who were not the actual buyers of the firearms identified herein and the completion of ATF Form 4473 in names other than the actual transferee/buyer of the firearms identified herein.

Manner and Means

10. It was part of this offense that Arnolando Louis Lopez and Jenelius O. Crew, enlisted the help of Michelle Renee Williams, Kayla Reanne McNeel, Teyawna Lorine Roberson, Michael Allen Cervantes and Libertad Santos Lopez and individuals identified only as C.R.R. and P.N.S. to

purchase firearms for Arnoldo Louis Lopez and Jenelius O. Crew from Federal Firearms Licensed Dealers in San Antonio, Texas.

Overt Acts

11. On or about July 9, 2012, Teyawna Lorine Roberson purchased a Romarm/Cugir, Model GP WASR-1063, 7.62x39 rifle bearing serial number 19651J3988 at Action Pawn #14, 5345 Walzem Road, San Antonio, Texas.

12. On or about July 10, 2012, Teyawna Lorine Roberson purchased a Smith & Wesson, Model MP15, 5.56 caliber rifle bearing serial number SP59545 at Academy #125, 4071 N. Loop 1604 West, San Antonio, Texas.

13. On or about July 10, 2012, Teyawna Lorine Roberson purchased a Bushmaster, Model C15, 5.56 caliber rifle bearing serial number CRB035382 at Academy #36, 2727 N.W. Loop #410, San Antonio, Texas.

14. On or about July 15, 2012, Kayla Reanne McNeel purchased a Bushmaster C15 .223 caliber rifle bearing serial number CRB035457 at Academy LTD #41 located at 2024 N. FM 1604 East, San Antonio, Texas.

15. On or about July 16, 2012, an individual identified herein only as C.R.R. purchased a Bushmaster C15 .5.56 caliber rifle bearing serial number CRB035361 at Academy #36 located at 2727 N.E. Loop 410, San Antonio, Texas.

16. On or about July 18, 2012, an individual identified herein only as C.R.R. purchased two Bushmaster C15 .5.56 caliber rifles bearing serial numbers CRB035411 and CRB035745 at Academy #36 located at 2727 N.E. Loop 410, San Antonio, Texas.

17. On or about July 25, 2012, Michelle Renee Williams purchased a Romarm/Cugir Model GP WASR 1063 7.62x39 rifle bearing serial number 1971CZ1308 and a DPMS A-15 5.56

rifle bearing serial number FH147702 at Action Pawn #12, located at 5925 San Pedro Ave., in San Antonio, Texas.

18. On or about July 26, 2012, Michael Allen Cervantes purchased a Romarm/Cugir, Model GP WASR 10/63, bearing serial number 1972DJ0521 and a Century Arms Inc., Model AKMS 7.62x39 rifle, bearing serial number KM506213 at Action Pawn #11 located at 2755 SW Military Dr., San Antonio, Texas.

19. On or about July 26, 2012, Kayla Reanne McNeel purchased two DPMS Model A-15 5.56 caliber rifles bearing serial numbers FH147145 and FH147153 at Cabela's Retail-Buda, TX, located at 15570 IH 35, Buda, Texas.

20. On or about July 26, 2012, Kayla Reanne McNeel purchased two Bushmaster C-15 5.56 caliber rifles bearing serial numbers CRB034034 and CRB033166 at Dick's Sporting Goods #795, located at 303 Creekside Way, New Braunfels, Texas.

21. On or about July 27, 2012, Michelle Renee Williams purchased a Bushmaster model C15, .223 caliber rifle bearing serial number CRB033190 from Dick's Sporting Goods Inc. #717, located at 18103 Rim Drive, San Antonio, Texas.

22. On or about July 27, 2012, Michelle Renee Williams purchased a Bushmaster C15, 5.51 caliber rifle bearing serial number CRB032619 at Dick's Sporting Goods #795, located at 303 Creekside Way, New Braunfels, Texas.

23. On or about July 27, 2012, Michelle Renee Williams attempted to purchase a DPMS .223 caliber rifle at Wal-Mart #0765, located at 16503 Nacogdoches Road, San Antonio, Texas.

24. On or about July 27, 2012, Kayla Reanne McNeel attempted to purchase two Bushmaster C-15, .223 caliber rifles from Dick's Sporting Goods Inc. #717, located at 18103 Rim Drive, San Antonio, Texas.

25. On or about August 4, 2012, Libertad Santos Lopez purchased two Century Arms/Romarm 7.62X39mm GP WASR 10/63 rifles bearing serial numbers 1972CC0803 and 1986RA3509 at Spreadfire, 9410-C Anderson Mill Road, Austin Texas.

26. On or about September 2, 2012, an individual identified only as P.N.S. purchased a Romarm/Cugir, Model WASR 10/63, 7.62x39mm rifle bearing serial number 1972CC0790 from Chernushin Enterprises, at Saxet Gun Show in San Antonio, Texas.

All in violation of Title 18, United States Code, Sections 371 and 924(a)(1)(A).

COUNT TWO
[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about July 9, 2012, in the Western District of Texas, the Defendants,

JENELIUS O. CREW, (1),
and
TEYAWNA LORINE ROBERSON, (4),

aided, abetted, counseled, commanded, induced and procured, in connection with and during the purchase and acquisition of a firearm, to-wit: a Romarm/Cugir, Model GP/WASR-10/63, 7.62x39 rifle bearing serial number 19651J3988 at Action Pawn #14, 5345 Walzem Road, San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #14, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that TEYAWNA LORINE ROBERSON did execute Bureau of Alcohol, Tobacco, and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearm indicated on the Form 4473; whereas in truth and in fact TEYAWNA LORINE ROBERSON purchased the firearm for and on behalf of JENELIUS O. CREW, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT THREE
[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about July 10, 2012, in the Western District of Texas, the Defendants,

JENELIUS O. CREW, (1),
and
TEYAWNA LORINE ROBERSON, (4),

aided, abetted, counseled, commanded, induced and procured, in connection with and during the purchase and acquisition of a firearm, to-wit: a Smith & Wesson, Model MP15, 5.56 caliber rifle bearing serial number SP59545 at Academy #125, 4071 N. Loop 1604 West, San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Academy #125, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that TEYAWNA LORINE ROBERSON did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearm indicated on the Form 4473; whereas in truth and in fact TEYAWNA LORINE ROBERSON purchased the firearm for and on behalf of JENELIUS O. CREW, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT FOUR
[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about July 10, 2012, in the Western District of Texas, the Defendants,

JENELIUS O. CREW, (1),
and
TEYAWNA LORINE ROBERSON, (4),

aided, abetted, counseled, commanded, induced and procured, in connection with and during the purchase and acquisition of a firearm, to-wit: a Bushmaster, Model C15, 5.56 caliber rifle bearing serial number CRB035382 at Academy #36, 2727 N.E. Loop #410, San Antonio, Texas,

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Academy #36, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that TEYAWNA LORINE ROBERSON did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearm indicated on the Form 4473; whereas in truth and in fact TEYAWNA LORINE ROBERSON purchased the firearm for and on behalf of JENELIUS O. CREW, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT FIVE
[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about July 15, 2012, in the Western District of Texas, the Defendants,

JENELIUS O. CREW, (1),
and
KAYLA REANNE McNEEL, (3),

aided, abetted, counseled, commanded, induced and procured, in connection with and during the purchase and acquisition of a firearm, to-wit: a Bushmaster C15 .223 caliber rifle bearing serial number CRB035457, at Academy LTD #41, located at 2024 N. FM 1604, San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Academy LTD #41, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that KAYLA REANNE McNEEL did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearm indicated on the Form 4473; whereas in truth and in fact KAYLA REANNE McNEEL purchased the firearm for and on behalf of JENELIUS O. CREW, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT SIX
[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about July 16, 2012, in the Western District of Texas, the Defendant,

ARNOLDO LOUIS LOPEZ, (5), aka "Looney,"

and an individual identified herein only as C.R.R., aided, abetted, counseled, commanded, induced and procured, in connection with and during the purchase and acquisition of a firearm, to-wit: a Bushmaster C15, 5.56 caliber rifle bearing serial number CRB035361 at ~~Action Pawn~~ ^{Academy} #36, located at 2727 N.E. Loop 410, San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Academy #36, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that an individual identified only as C.R.R. did execute Bureau of Alcohol, Tobacco, and Firearms Form 4473, Firearm Transaction Record, certifying that he was the actual buyer of the firearm indicated on the Form 4473; whereas in truth and in fact C.R.R. purchased the firearm for and on behalf of ARNOLDO LOUIS LOPEZ, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A). (init)

COUNT SEVEN
[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about July 18, 2012, in the Western District of Texas, the Defendant,

ARNOLDO LOUIS LOPEZ, (5), aka "Looney,"

and an individual identified herein only as C.R.R., aided, abetted, counseled, commanded, induced and procured, in connection with and during the purchase and acquisition of a firearm, to-wit: two Bushmaster C15, 5.56 caliber rifle bearing serial number CRB035411 and CRB035745 at Academy #36, located at 2727 N.E. Loop 410, San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44

of Title 18, United States Code, to be kept in the records of Academy #36, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that an individual identified only as C.R.R. did execute Bureau of Alcohol, Tobacco, and Firearms Form 4473, Firearm Transaction Record, certifying that he was the actual buyer of the firearm indicated on the Form 4473; whereas in truth and in fact C.R.R. purchased the firearm for and on behalf of ARNOLDO LOUIS LOPEZ, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT EIGHT
[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about July 25, 2012, in the Western District of Texas, the Defendants,

JENELIUS O. CREW, (1),
and
MICHELLE RENEE WILLIAMS, (2),

aided, abetted, counseled, commanded, induced and procured, in connection with and during the purchase and acquisition of firearms, to-wit: a Romarm/Cugir Model GP WASR 1063 7.62x39 rifle bearing serial number 1971CZ1308 and a DPMS A-15 5.56 rifle bearing serial number FH147702 at Action Pawn #12, located at 5925 San Pedro Ave., San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #12, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that MICHELLE RENEE WILLIAMS did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearms indicated on the Form 4473; whereas in truth and in fact MICHELLE RENEE WILLIAMS purchased the firearms for and on behalf of JENELIUS O. CREW, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT NINE
[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about July 26, 2012, in the Western District of Texas, the Defendants,

ARNOLDO LOUIS LOPEZ, (5), aka "Looney,"
and
MICHAEL ALLEN CERVANTES, (7),

aided, abetted, counseled, commanded, induced and procured, in connection with and during the purchase and acquisition of firearms, to-wit: a Romarm/Cugir, Model GP WASR 10/63, bearing serial number 1972DJ0521 and a Century Arms Inc., Model AKMS 7.62x39mm rifle, bearing serial number KM506213, at Action Pawn #11, located at 2755 S.W. Military Dr., San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #11, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that MICHAEL ALLEN CERVANTES did execute Bureau of Alcohol, Tobacco, and Firearms Form 4473, Firearm Transaction Record, certifying that he was the actual buyer of the firearm indicated on the Form 4473; whereas in truth and in fact MICHAEL ALLEN CERVANTES purchased the firearm for and on behalf of ARNOLDO LOUIS LOPEZ, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT TEN
[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about July 26, 2012, in the Western District of Texas, the Defendants,

JENELIUS O. CREW, (1),
and
KAYLA REANNE McNEEL, (3),

aided, abetted, counseled, commanded, induced and procured, in connection with and during the purchase and acquisition of two firearms, to-wit: two DPMS Model A-15 5.56 caliber rifles

bearing serial numbers FH147145 and FH147153 at Cabela's Retail-Buda, TX, located at 15570 IH 35, Buda, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Cabela's Retail-Buda, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that KAYLA REANNE McNEEL did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearms indicated on the Form 4473; whereas in truth and in fact KAYLA REANNE McNEEL purchased the firearms for and on behalf of JENELIUS O. CREW in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT ELEVEN

[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about July 26, 2012, in the Western District of Texas, the Defendants,

**JENELIUS O. CREW, (1),
and
KAYLA REANNE McNEEL, (3),**

aided, abetted, counseled, commanded, induced and procured, in connection with and during the purchase of two firearms, to-wit: a Bushmaster C-15 5.56 caliber rifle bearing serial number CRB034034 and a Bushmaster C15 5.56 caliber rifle bearing serial number CRB033166 at Dick's Sporting Goods #795, located at 303 Creekside Way, New Braunfels, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Dick's Sporting Goods #795, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that KAYLA REANNE McNEEL did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearms indicated on the Form 4473; whereas in truth and in fact KAYLA REANNE McNEEL was

purchasing the firearms for and on behalf of JENELIUS O. CREW, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT TWELVE
[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about July 27, 2012, in the Western District of Texas, the Defendants,

JENELIUS O. CREW, (1),
and
MICHELLE RENEE WILLIAMS, (2),

aided, abetted, counseled, commanded, induced and procured, in connection with and during the purchase and acquisition of a firearm, to-wit: a Bushmaster model C15, .223 caliber rifle bearing serial number CRB033190 at Dick's Sporting Goods Inc. #717, located at 18103 Rim Drive, San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Dick's Sporting Goods Inc. #717, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that MICHELLE RENEE WILLIAMS did execute Bureau of Alcohol, Tobacco, and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearm indicated on the Form 4473; whereas in truth and in fact MICHELLE RENEE WILLIAMS was purchasing the firearm for and on behalf of JENELIUS O. CREW, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT THIRTEEN
[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about July 27, 2012, in the Western District of Texas, the Defendants,

JENELIUS O. CREW, (1),
and
MICHELLE RENEE WILLIAMS, (2),

aided, abetted, counseled, commanded, induced and procured, in connection with and during the purchase and acquisition of a firearm, to-wit: a Bushmaster C15, 5.51 caliber rifle bearing serial number CRB032619, at Dick's Sporting Goods #795, 303 Creekside Way, New Braunfels, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Dick's Sporting Goods #795, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that MICHELLE RENEE WILLIAMS did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearm indicated on the Form 4473; whereas in truth and in fact MICHELLE RENEE WILLIAMS was purchasing the firearm for and on behalf of JENELIUS O. CREW, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT FOURTEEN
[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about July 27, 2012, in the Western District of Texas, the Defendants,

JENELIUS O. CREW, (1),
and
MICHELLE RENEE WILLIAMS, (2),

aided, abetted, counseled, commanded, induced and procured, in connection with and during the attempt to purchase and acquire a firearm, to-wit: a DPMS .223 caliber rifle at Wal-Mart #0765, 16503 Nacogdoches Road, San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Wal-Mart #0765, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that MICHELLE RENEE WILLIAMS did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearm indicated on the Form

4473; whereas in truth and in fact MICHELLE RENEE WILLIAMS was attempting to purchase the firearm for and on behalf of JENELIUS O. CREW, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT FIFTEEN
[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about July 27, 2012, in the Western District of Texas, the Defendants,

JENELIUS O. CREW, (1),
and
KAYLA REANNE McNEEL, (3),

aided, abetted, counseled, commanded, induced and procured aided, in connection with and during the attempt to purchase and acquire two firearms, to-wit: two Bushmaster C15, .223 caliber rifles, at Dick's Sporting Goods Inc. #717, 18103 Rim Drive San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Dick's Sporting Goods, Inc. #717, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that KAYLA REANNE McNEEL did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearms indicated on the Form 4473; whereas in truth and in fact KAYLA REANNE McNEEL was attempting to purchase the firearms for JENELIUS O. CREW, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A), contrary to the laws and regulations of the United States.

COUNT SIXTEEN
[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about August 4, 2012, in the Western District of Texas, the Defendants,

ARNOLDO LOUIS LOPEZ, (5), aka "Looney,"
and
LIBERTAD SANTOS LOPEZ, (6),

aided, abetted, counseled, commanded, induced and procured, in connection with and during the purchase of two firearms, to-wit: two Century Arms/Romarm 7.62X39mm GP WASR 10/63 rifles bearing serial numbers 1972CC0803 and 1986RA3509 at Spreadfire, 9410-C Anderson Mill Road, Austin Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Spreadfire, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that LIBERTAD SANTOS LOPEZ did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearms indicated on the Form 4473; whereas in truth and in fact LIBERTAD SANTOS LOPEZ was purchasing the firearms for and on behalf of ARNOLDO LOUIS LOPEZ, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A), contrary to the laws and regulations of the United States.

COUNT SEVENTEEN

[18 U.S.C. Sections 2 and 924(a)(1)(A)]

On or about September 2, 2012, in the Western District of Texas, the Defendant,

ARNOLDO LOUIS LOPEZ, (5), aka "Looney,"

and an individual identified herein only as P.N.S., aided, abetted, counseled, commanded, induced and procured, in connection with and during the purchase of a Romarm/Cugir, Model WASR 10/63, 7.62x39mm rifle bearing serial number 1972CC0790 from Chernushin Enterprises, at Saxet Gun Show in San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Chernushin Enterprises, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that P.N.S. did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of

the firearms indicated on the Form 4473; whereas in truth and in fact P.N.S. was purchasing the firearms for and on behalf of ARNOLDO LOUIS LOPEZ, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A), contrary to the laws and regulations of the United States.

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE
[Title 18 U.S.C. § 924(a)(1)(A), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, See Fed. R. Crim. P. 32.2]

I.

Firearms Violations and Forfeiture Statutes

As a result of the foregoing criminal violations set forth in Counts One through Seventeen, which are punishable by imprisonment for more than one year, Defendants, JENELIUS O. CREW, MICHELLE RENEE WILLIAMS, KAYLA REANNE McNEEL, TEYAWNA LORINE ROBERSON, ARNOLDO LOUIS LOPEZ, LIBERTAD SANTOS LOPEZ and MICHAEL ALLEN CERVANTES, shall forfeit any and all right, title, and interest in the property described below to the United States pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states the following:

Title 18 U.S.C. § 924. Penalties

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of . . . section 924 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter

This Notice of Demand for Forfeiture includes but is not limited to the properties described below in paragraph II.

II.
Personal Properties

- -Romarm/Cugir, Model GP WASR 1063 7.62 x 39 rifle, serial number 19651J3988
- -Smith & Wesson, Model MP15 5.56 caliber rifle, serial number SP59545
- -Bushmaster Model C15 5.56 caliber rifle, serial number CRB035382
- -Bushmaster Model C-15 .223 caliber rifle, serial number CRB035457
- -Bushmaster C15, 5.56 caliber rifle bearing serial number CRB035361
- -Bushmaster C15, 5.56 caliber rifle bearing serial number CRB035411
- -Bushmaster C15, 5.56 caliber rifle bearing serial number CRB035745
- Romarm/Cugir, Model WASR 10/63, 7.62x39mm rifle bearing serial number 1971CZ1308
- -DPMS Model A-15 5.56 caliber rifle, serial number FH147702
- Romarm/Cugir, Model WASR 10/63, 7.62x39mm rifle bearing serial number 1972DJ0521
- -Century Arms Inc., Model AKMS 7.62x39 rifle, bearing serial number KM506213
- -DPMS Model A-15 5.56 caliber rifle, serial number FH147145
- -DPMS Model A-15 5.56 caliber rifle, serial number FH147153
- -Bushmaster Model C-15 5.56 caliber rifle, serial number CRB034034
- -Bushmaster Model C-15 5.56 caliber rifle, serial number CRB033166
- -Bushmaster Model C-15 .223 caliber rifle, serial number CRB033190
- -Bushmaster Model C-15 5.51 caliber rifle, serial number CRB032619
- -Century Arms/Romarm 7.62 x 39mm GP WASR 10/63 rifle, serial number 1972CC0803
- -Century Arms/Romarm 7.62 x 39mm GP WASR 10/63 rifle, serial number 1986RA3509
- -Romarm/Cugir, Model WASR 10/63, 7.62x39mm rifle bearing serial number 1972CC0790

A TRUE BILL.


FOREPERSON OF THE GRAND JURY


ROBERT PITMAN
UNITED STATES ATTORNEY

By:


BILL BAUMANN
Assistant United States Attorney